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Attorneys for Defendant Ho-Chunk, Inc.

UNITED STATES DISTRICT COURT  
  
DISTRICT OF OREGON  
  
PORTLAND DIVISION

JOHN H. DOSSETT,

Plaintiff,

v.

HO-CHUNK, INC., a tribal corporation  
formed by the Winnebago Tribe of  
Nebraska, NOBLE SAVAGE MEDIA,  
L.L.C, a Limited Liability Company of  
unknown origin, THE NATIONAL  
CONGRESS OF AMERICAN INDIANS  
OF THE UNITED STATES AND  
ALASKA, an Oklahoma Non For Profit  
Corporation, and HIGH COUNTRY  
NEWS, a Colorado Nonprofit Corporation,

Defendants.

Case No.: 3:19-cv-01386

DEFENDANT HO-CHUNK, INC.'S  
RENEWED MOTION TO DISMISS AND  
REQUEST FOR EXPEDITED BRIEFING  
SCHEDULE

**LR-7-1 CERTIFICATION**

In compliance with LR-7-1, the parties have made a good faith effort through personal or telephone conferences to resolve the dispute and have been unable to do so.

**MOTION**

COMES NOW Defendant Ho-Chunk, Inc. (“HCI”), by and through counsel, and renews its motion to dismiss the instant Complaint for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1) based on sovereign immunity from suit. HCI originally moved to dismiss on November 4, 2019 (ECF 35). HCI renews its motion based upon Dossett’s recent communication with the Court, which is discussed in detail in the Memorandum filed herewith. HCI further respectfully requests that this Court Order an expedited briefing schedule on HCI’s renewed motion that requires Mr. Dossett to submit any brief in opposition by **Monday, February 24, 2020**, and permits any replies thereto to be filed by **Tuesday, February 25, 2020**. Good cause exists for expedited briefing, as an oral argument is currently scheduled on the original motion to dismiss on at 10:30 a.m. on **Wednesday, February 26, 2020**, and resolution of this question is both ripe and essential to judicial efficiency.

Date: February 21, 2020

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